

From: John Shirrell
435 W Butterfield
Elmhurst, IL 60126

To: Postal Regulatory Commission
Cc: USPS

Re: Docket CP2012-2

Dear Postal Regulatory Commission,

I hereby request that, for the modification to the Mail Classification Schedule proposed in docket CP2012-2 for the Shipping Services price change¹, USPS be required to provide more detail in the MCS as well as the Domestic Mail Manual regarding what constitutes a retail deposit of a Priority Mail Regional Rate Box. The current language is vague and it leaves me concerned that individual post offices will be left to implement the policy in an inconsistent manner and some mailers will be charged the retail deposit fee under circumstances it was not intended to apply.

Here are the circumstances that I would specifically like to know whether or not this additional fee should apply:

1. Placing inside of a residential mailbox (home-attached).
2. Placing inside of a residential mailbox (rural street-facing).
3. Placing near enough to a residential mailbox that the carrier would customarily pick up the package.
4. For business locations, placing at the location where that business's mail is usually picked up by the carrier.
5. Placing in any of the locations specified above, or another location permitted for Carrier Pickup, and scheduling, and being approved for, a Carrier Pickup at that location.
6. Placing in a neighborhood collection ("Blue") box.
7. Placing in a depository slot or box at the Post Office.
8. Placing in an oversized collection box, commonly provided at Automated Postal Center locations.
9. Leaving packages on the Retail Counter with PC postage already attached, no clerk intervention necessary.
10. Taking packages to the Retail Counter with PC postage already attached, and requesting the clerk scan a Shipment Confirmation Acceptance Notice ("SCAN Form") – no additional clerk intervention necessary.
11. Taking packages to the Retail Counter without PC postage and paying postage at the counter through the retail Point-Of-Sale system.

Obviously there are a large number of ways in which mail could enter the USPS mainstream, and it is not made clear which ones are considered to be "Retail" deposit. The way I interpret the MCS changes is, only #11 above would have the extra fee, as all of #1 through #10 are already permitted methods of deposit for Commercial Base Priority Mail with no surcharge.

¹ "If deposited at retail, a \$0.75 fee will be added." Notice CP2012-2.pdf, Page 2.

However, the vague language may cause some Post Office employees to delay, return, and mark-up postage due, mail which is properly paid, due to the lack of a clear definition – and I find the possibility of that outcome unacceptable. I look forward to action on this issue.

Sincerely,
John Shirrell